Interstate Council on Water Policy

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Marlene H. Dortch
Commission's Secretary
Office of the Secretary
Federal Communications Commission
445 12th St. NW
Washington DC 20554

Regarding: ET Docket No. 10-123
National Broadband Plan, Uses of 1675-1710 MHz

Dear Ms. Dortch,

On behalf of the Interstate Council on Water Policy (ICWP), we respectfully submit these comments related to the potential commercial use of the 1675-1710 MHz bandwidth.

The ICWP was established in 1959 and provides a national forum for state, interstate and local water officials to help one another improve water planning and management capabilities and to speak as a group to the need for federal policy and assistance on specific issues. What our members have in common is the responsibility for developing policy, managing programs and implementing projects that reduce the risk of flood and drought impacts and balance the needs of human communities with the protection of water quality, wetlands and riparian areas and the species that depend upon them.

The water management community depends heavily upon the real-time data that are transmitted by the GOES system in the 1675-1710 MHz bandwidth. These data are important for keeping our communities out of harm's way during extreme events such as flash floods, hurricanes, wildfires and earthquakes. They are used in assuring that reservoirs, levees and bridges are designed adequately. The data are critical for reservoir operations (e.g., for municipal and irrigation supplies, navigation, recreation and ecological flows) and to provide emergency warnings that help families and businesses move quickly out of the way to avoid flood, tornados and other hazards.

The USGS and NOAA have developed sophisticated models and other decision support tools that rely on the data transmitted by the GOES system. In addition to the federal agencies, many state water management agencies depend on the GOES system for the transmission of their streamflow and diversion monitoring data. America's growing populations, economic development, land use changes and anticipation of climate change are stretching our water management capabilities. As a result, reliable access to real-time streamgaging and weather data will continue to increase in importance, as water officials and agencies are expected to find more effective ways in which our water resources can be managed in the most efficient ways. This will only be possible as long as we know how much water is available and what the precipitation and evapotranspiration patterns are in different areas of a specific river basin. Any decrease in

the accuracy, reliability or timeliness of the NWS and USGS data would present an unacceptable risk in the management of our water resources and the protection of our communities.

Some have suggested that the internet can provide a replacement for some of these services. As happens frequently during natural disasters, such as severe storms, fires, floods or earthquakes, internet service can be disrupted, sometimes for days at a time, at the moment when it is needed most. Furthermore, unless these data could be distributed in real-time over the internet, the delay would often render these data irrelevant.

As one example of the many compelling uses of these data, consider the Interstate Commission on the Potomac River Basin's management of water supplies for the Metropolitan Washington Area during droughts. The Commission depends on the network of real-time streamgages for hourly monitoring as they manage releases of stored water. The streamgage network is especially important for real-time monitoring of the travel of those reservoir releases over approximate 200 miles and about nine days downstream to the metropolitan Washington area. Without the timely access to the streamgage data from all relevant stations, there would be a strong tendency to release greater volumes of water from their reservoir storage accounts (to compensate for the uncertainties) in order to assure the availability of sufficient water downstream at the intake structures. The coordination of upstream storage releases with downstream intake capacity requires reliable access to careful measurements of streamflow at many locations.

We recognize that the cell phone industry desires additional bandwidth, and that they can probably make new, very innovative and highly profitable uses of additional information transmission capacity. We also recognize that it is a central role of government to assure public safety and provide the basis for appropriate use of and care for America's rivers and water supplies. The hydrologic, meteorological and seismic data that are transmitted via the GOES system are fundamental to saving lives and protecting property when the forces of nature strike.

Before the Commission gives further consideration to reallocating or sharing this bandwidth for the benefit of other users, it is vital that we know how many direct access customers rely on the GOES downlinks already and understand the potential impacts to their time-sensitive functions. It would also be useful to evaluate the innovation opportunities that current and future non-federal users of the existing services may lose if their direct access to the raw data is limited.

Our view is that the FCC and NTIA should look for other bandwidth to offer to the private sector, since the current uses of this bandwidth are necessary to sustain essential public purposes and their reliability and timeliness should not be compromised.

We would be pleased to provide additional information and examples to illustrate the important uses of the data transmitted within this bandwidth of the GOES system.

With best regards,

Susan Sullivan, Chairman
Interstate Council on Water Policy

Copy: ICWP Members